

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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ROW VAUGHN WELLS, INDIVIDUALLY )  
AND AS ADMINISTRATRIX OF THE )  
ESTATE OF TYRE DEANDRE NICHOLS, )  
DECEASED, )

Plaintiffs, )

v. )

CASE NO. 2:23-CV-02224  
JURY DEMAND

THE CITY OF MEMPHIS, A MUNICIPALITY; )  
CHIEF CERELYN DAVIS, IN HER OFFICIAL )  
CAPACITY; EMMITT MARTIN III, IN HIS )  
INDIVIDUAL CAPACITY; DEMETRIUS )  
HALEY, IN HIS INDIVIDUAL CAPACITY; )  
JUSTIN SMITH, IN HIS INDIVIDUAL )  
CAPACITY; DESMOND MILL, JR. IN HIS )  
INDIVIDUAL CAPACITY; TADARRIUS )  
BEAN, IN HIS INDIVIDUAL CAPACITY; )  
PRESTON HEMPHILL, IN HIS INDIVIDUAL )  
CAPACITY; ROBERT LONG, IN HIS )  
INDIVIDUAL CAPACITY; JAMICHAEL )  
SANDRIDGE, IN HIS INDIVIDUAL )  
CAPACITY; MICHELLE WHITAKER, IN )  
HER INDIVIDUAL CAPACITY; DEWAYNE )  
SMITH, IN HIS INDIVIDUAL CAPACITY )  
AND AS AGENT OF THE CITY OF )  
MEMPHIS, )

Defendants. )

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**PLAINTIFF'S MOTION TO EXCUSE PRESENCE OF COUNSEL OF RECORD AT  
STATUS CONFERENCE**

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Plaintiff Row Vaughn Wells, through her undersigned counsel, hereby moves this Court for an order excusing two of her attorneys of record from the January 3, 2025 Status Conference, for good cause shown, as supported below:

1. On December 27, 2024, Plaintiff filed an Unopposed Motion for Hearing on Case Scheduling Order (ECF 267), requesting a status hearing and seeking clarity from the Court on the case schedule.

2. On December 28, 2024, the Court granted Plaintiff's motion, and set an in-person Status Conference for Friday, January 3, 2025 at 2:00p.m. The Court further ordered that "all attorneys of record shall be present." ECF 268.

3. Most of Plaintiff's counsel will be present at the hearing, including all attorneys with primary responsibility for this case. However, two of Plaintiff's attorneys, who are not local to Memphis, are unable to attend for the following reasons:

- a. Attorney Bhavani Raveendran is unable to attend because she will be traveling to India on January 3, 2025;
- b. Attorney Sam Harton is unable to attend as she is completing dispositive briefing for a Rule 12(c) motion in a matter pending in the Northern District of Georgia, *Sluder v. Gilmer County, et. al.* 4:24-cv-00181.

4. Ms. Raveendran and Ms. Harton are regrettably unable to attend the in-person Status Conference in this matter due to these preexisting scheduling conflicts.

5. On January 2, 2025, Plaintiff's counsel conferred via email with Defendants' counsel regarding this Motion. All Defendants who have responded as of the time of this filing stated that they have no objection to the relief requested.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court excuse Ms. Raveendran and Ms. Harton from attending the January 3, 2025 Status Conference, as they are unable to attend for good cause shown.

Dated: January 2, 2024

Dated: January 2, 2025

Respectfully submitted,

/s/ Sarah M. Raisch

Antonio M. Romanucci (Ill. Bar No. 6190290) (*pro hac vice*)

Bhavani K. Raveendran (Ill. Bar No. 6309968) (*pro hac vice*)

Sarah Raisch (Ill. Bar No. 6305374) (*pro hac vice*)

Joshua M. Levin (Ill. Bar No. 6320993) (*pro hac vice*)

Stephen H. Weil (Ill. Bar No. 6291026) (*pro hac vice*)

Sam Harton (Ill. Bar No. 6342112) (*pro hac vice*)

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*Attorneys for Plaintiff*

**CERTIFICATE OF CONSULTATION**

Pursuant to Local Rule 7.2(a)(1)(B), the undersigned hereby certifies that on January 2, 2025, counsel for Plaintiff consulted with all parties via email regarding the relief requested in the foregoing motion. Counsel for Defendant Robert Long, Defendant Desmond Mills, Defendant Michelle Whitaker, Defendant JaMichael Sandridge, and Defendant Demetrius Haley do not object to this motion. No other parties responded as of the time of this filing.

/s/ Sarah M. Raisch

Sarah M. Raisch